

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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CAROLYN GREENE, on Behalf of Herself and	:
All Others Similarly Situated,	:
	:
Plaintiff,	: Civ. No. 1:03 CV 12628 (NG)
	:
vs.	:
	:
BIOPURE CORPORATION, THOMAS A. MOORE,	:
CARL W. RAUSCH and RONALD F. RICHARDS,	:
	:
Defendants.	:
	:
-----X	:

[Additional Captions Set Forth Below]

**MOTION FOR LEAVE TO FILE
REPLY OF PROPOSED LEAD PLAINTIFF RONALD ERICKSON
IN SUPPORT OF HIS MOTION TO BE APPOINTED LEAD PLAINTIFF
AND APPROVE HIS CHOICE OF COUNSEL**

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:
JOHN G. ESPOSITO, JR., on Behalf of Himself and
All Others Similarly Situated, :
:
Plaintiff, : Civ. No. 1:04 CV 10013 (NG)
:
vs. :
:
BIOPURE CORPORATION, THOMAS A. MOORE, :
CARL W. RAUSCH and RONALD F. RICHARDS, :
:
Defendants. :
-----X

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:
JOSEPH L. KING, on Behalf of Himself and
All Others Similarly Situated, :
:
Plaintiff, : Civ. No. 1:04 CV 10038 (NG)
:
vs. :
:
BIOPURE CORPORATION, THOMAS A. MOORE, :
CARL W. RAUSCH and RONALD F. RICHARDS, :
:
Defendants. :
-----X

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:
MICHAEL E. CRIDEN, Individually and on Behalf
of All Others Similarly Situated, :
:
Plaintiff, : Civ. No. 1:04 CV 10046 (NG)
:
vs. :
:
BIOPURE CORPORATION, THOMAS A. MOORE :
and CARL W. RAUSCH, :
:
Defendants. :
-----X

ISRAEL SHURKIN and SHARON SHURKIN,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

VS.

BIOPURE CORPORATION, THOMAS A. MOORE
and CARL W. RAUSCH.

Defendants.

JAMES J. NIZZO, VIRGINIA C. NIZZO and
CARLO CILIBERTI, on Behalf of Themselves
and All Others Similarly Situated,

Plaintiffs,

VS.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

BARRY BROOKS, on Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

VS.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

-----X
ANASTASIOS PERLEGIS, Individually and on :
Behalf of All Others Similarly Situated, :
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 :
Plaintiff, : Civ. No. 1:04 CV 10078 (NG)
 :
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vs. :
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 :
BIOPURE CORPORATION, THOMAS A. MOORE, :
THOMAS A. MOORE, CARL W. RAUSCH and :
RONALD F. RICHARDS, :
 :
 :
Defendants. :
-----X

MARTIN WEBER, on Behalf of Himself and All :
Others Similarly Situated, :
 :
 :
Plaintiffs, : Civ. No. 1:04 CV 10090 (NG)
 :
 :
vs. :
 :
 :
BIOPURE CORPORATION, THOMAS A. MOORE, :
THOMAS A. MOORE, CARL W. RAUSCH and :
RONALD F. RICHARDS, :
 :
 :
Defendants. :
-----X

BRUCE HAIMS, Individually and on Behalf of :
All Others Similarly Situated, :
 :
 :
Plaintiffs, : Civ. No. 1:04 CV 10144 (NG)
 :
 :
vs. :
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 :
BIOPURE CORPORATION, THOMAS A. MOORE, :
THOMAS A. MOORE, CARL W. RAUSCH and :
RONALD F. RICHARDS, :
 :
 :
Defendants. :
-----X

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MODEL PARTNERS LIMITED, Individually and	:
on Behalf of All Others Similarly Situated,	:
	:
Plaintiff,	: Civ. No. 1:04 CV 10155 (NG)
	:
vs.	:
	:
BIOPURE CORPORATION, THOMAS A.	:
MOORE, CARL W. RAUSCH and RONALD	:
F. RICHARDS,	:
	:
Defendants.	:

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JUNE E. PATENAUDE, Individually and on Behalf	:
of All Others Similarly Situated,	:
	:
Plaintiff,	: Civ. No. 1:04 CV 10179 (NG)
	:
vs.	:
	:
BIOPURE CORPORATION, THOMAS A.	:
MOORE, CARL W. RAUSCH and RONALD	:
F. RICHARDS,	:
	:
Defendants.	:

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NANCY L. PINCKNEY, and GERTRUDE	:
PINCKNEY, Individually and on Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	: Civ. No. 1:04 CV 10189 (NG)
	:
vs.	:
	:
BIOPURE CORPORATION, THOMAS A.	:
MOORE, CARL W. RAUSCH,	:
	:
Defendants.	:

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W. KENNETH JOHNSON, on Behalf of Himself	:
and All Others Similarly Situated,	:
	:
Plaintiff,	: Civ. No. 1:04 CV 10190 (NG)
	:
vs.	:
	:
BIOPURE CORPORATION, THOMAS A.	:
MOORE, CARL W. RAUSCH and RONALD	:
F. RICHARDS,	:
	:
Defendants.	:
-----X	
GREGORY KRUSZKA, on Behalf of Himself	:
and All Others Similarly Situated,	:
	:
Plaintiff,	: Civ. No. 1:04 CV 10202 (NG)
	:
BIOPURE CORPORATION, THOMAS A.	:
MOORE, CARL W. RAUSCH and RONALD	:
F. RICHARDS,	:
	:
Defendants.	:
-----X	

Proposed Lead Plaintiff Ronald Erickson hereby moves this Court for leave to file his reply in support of his motion to be appointed lead plaintiff and approve his choice of Stull, Stull & Brody and Shapiro Haber & Urmy as co-lead counsel and in response to the memorandum of the Biopure “Group” and the Homeyer “Group” in support of their competing lead plaintiff motions. Counsel for the parties have conferred and assented to this motion.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

Counsel for Proposed Lead Plaintiff Ronald Erickson hereby certifies that he has conferred with counsel for the Biopure and Homeyer groups and they have assented to this motion.

Dated: May 11, 2004

Respectfully submitted,

SHAPIRO HABER & URMY LLP

/s/Theodore M. Hess-Mahan

Edward F. Haber BBO #215620

Theodore M. Hess-Mahan BBO #557109

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**Proposed Co-Lead Counsel For
Plaintiff and The Class**